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November 30, 2005

**Via Email and Federal Express**

Kevin Turner  
On-Scene Coordinator  
EPA Emergency Response Branch, Region 5  
8588 Rt. 148  
Marion, IL 62959

**Re: RRG Clayton Chemical Site Soil Removal – Monthly  
Progress Report**

Dear Mr. Turner,

In accordance with Section VII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent for Removal Action for the RRG/Clayton Chemical Soils Site (Site), effective November 1, 2005, the Respondents are providing one e-mail and two hard copies of the first monthly progress report submitted in this matter.

If you have any questions or concerns, please let me know.

Very truly yours,

Allison R. Bach

ARB/arb  
Enclosure  
cc: Sharon Newlon  
Thomas Turner  
Garth Daley

DETROIT 25958-157 910142v1

**C o u n s e l l o r s   A t   L a w**

DETROIT   BLOOMFIELD HILLS   LANSING   GRAND RAPIDS   ANN ARBOR  
WASHINGTON, D.C.

## DRAFT

### STATUS REPORT # 1 (FOR PERIOD NOVEMBER 1 THROUGH 30, 2005) RRG/CLAYTON CHEMICAL SITE SAUGET, ILLINOIS

DECEMBER 1, 2005

This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and its designated On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent for Removal Action for the RRG/Clayton Chemical Soils Site dated October 28, 2005 (Settlement Agreement).

#### Effective Date

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site Potentially Responsible Party Group (the Respondents), received the Settlement Agreement. In accordance with Section XXVIII, Condition 76 of the Settlement Agreement, this date represented the Effective Date for the Settlement Agreement and started the compliance time clock for the Removal Action.

#### 1.0 Completed Activities

##### 1.1 Pre-mobilization Activities and Plan Development

Tasks completed for this reporting period were:

- On November 4, 2005, the following activities were completed
  - Contractor Site walk was conducted on November 4, 2005, by CRA. OSC Turner and START member Tom Binz were alerted to the intended Site visit on November 2, 2005, and START Binz was present at the Site on November 4, 2005
  - An Asbestos Survey was completed by Philips Service Corporation to determine the quantities and locations of asbestos containing material (ACM) at the Site
  - The Request For Proposals (RFP) documents were initially issued to the nine interested bidders.
- On November 8, 2005, the Respondents provided OSC Turner and U.S. EPA with the required information for the selected Project Coordinator for the Solids Removal Action. The Respondents selected Mr. Garth Daley of Conestoga-Rovers & Associates (CRA) to serve as the Oversight Contractor for the project and provided notification in accordance with Section VII, Condition 12.

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- The report documenting the findings from the survey activities was issued on November 9, 2005. An electronic copy of the Asbestos Survey report is included with this electronic submittal.
- In accordance with Section VIII, Condition 17 of the SETTLEMENT AGREEMENT, a Draft Health and Safety Plan (HASP) was submitted to U.S. EPA for review on November 15, 2005.
- The Respondents selected a Removal Contractor on November 16, 2005, and informed U.S. EPA of the decision in accordance with Section VII, Condition 11. Brandenburg Industrial Services (Brandenburg) was the chosen Removal Contractor for the Solids Removal Action. The notification also included the names of the two sub-contractors, Keter Consultants and EQ Industrial Services, which were identified by Brandenburg in their proposal. Additional information on these sub-contractors was submitted to U.S. EPA on November 17, 2005.

#### **1.2 Sampling and Analysis**

The only samples collected during the period were the asbestos samples collected as part of the Asbestos Survey activities. An electronic copy of the report detailing these activities and the subsequent findings is included with this report.

#### **1.3 Removal Action Work**

In accordance with the RAWP, an Asbestos Abatement Action will be completed ahead of initiating activities required for the Solids Removal. Based on the quantities of identified ACM from the Asbestos Survey report, these abatement activities are expected to take 2 to 5 workdays to complete. Subsequently Brandenburg submitted the required National Emission Standards for Hazardous Air Pollutants (NESHAP) notification, and was informed that the earliest date that asbestos abatement activities will be December 5, 2005. Additional activities undertaken since the notification to Brandenburg surrounds the collection of information and development of various Site plans to dictate how Site activities are performed.

#### **2.0 Encountered Problems, Resolutions, and Anticipated Problems**

The only problem encountered to date has been a scheduling issue related to the initial Site mobilization date. Based on the combination of dates and deadlines, the deadline date for Site mobilization is December 2, 2005. However, this date is a Friday, and

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precedes the allowable work date for asbestos abatement actions to be performed. In discussions with OSC Turner on Monday, November 28, 2005, verbal approval was granted to delay the mobilization date until December 5, 2005.

No problems are anticipated for the upcoming period with the possible exception of weather related delays.

#### **3.0 Analytical Data Generated/Received**

The only samples collected between the Effective date and the Report Date were those collected during the asbestos survey on November 4, 2005. Analytical results from those samples, as well as Site maps showing the locations of the collected samples are presented in the Asbestos Survey report generated to document the investigation. An electronic copy of that report is included with this Status Report.

#### **4.0 Anticipated Activities For Upcoming Report Period**

##### **4.1 Site Plans**

Brandenburg is expected to provide draft versions of all Site Activity Plan to CRA for review prior to mobilization to the Site on December 5, 2005. As these various plans are finalized, Site related activities will be initiated.

##### **4.2 Sampling and Analysis**

Waste Characterization sampling will be initiated during the upcoming reporting period. Specifically samples will be collected from the various drum and tank at the Site for material compatibility and preliminary screening purposes.

##### **4.3 Removal Action Work**

Among the activities expected to be performed and/or completed during the upcoming report period are the required Site preparation activities, asbestos abatement activities, drum and tank sampling activities, piping decommissioning activities, and waste characterization activities. An anticipated schedule for these activities appears below.

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**5.0 Anticipated Schedule**

<i>Activity</i>	<i>Duration (business days)</i>	<i>Expected Start Date</i>
Site Plan Development	7 days	December 1, 2005
Site Mobilization/Preparation	5 days	December 5, 2005
Asbestos Abatement	2-5 days	December 7, 2005
Chemical Sweep	1-2 days	December 12, 2005
Waste Characterization	40 days	December 14, 2005
Tank Sampling/ Sludge Removal	30 days	December 14, 2005
Piping Demolition	8 days	December 16, 2005
Holiday Break	7 days	December 22, 2005
Submit Status Report # 2	1 day	December 29, 2005
Remobilization	1 day	January 3, 2006